

1 Robert F. McCauley (SBN: 162056)  
robert.mccauley@finnegan.com

2 Jin Zhang (SBN: 243880)  
jin.zhang@finnegan.com

3 FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

4 3300 Hillview Ave  
5 Palo Alto, CA 94304  
6 Telephone: (650) 849-6600  
Facsimile: (650) 849-6666

7 Christopher P. Foley (not yet admitted *pro hac vice*)  
8 FINNEGAN, HENDERSON,  
FARABOW, GARRETT & DUNNER, L.L.P.

9 Two Freedom Square  
10 11955 Freedom Drive  
Reston, VA 20190  
11 Telephone: (571) 203-2720  
Facsimile: (202) 408-4400

12 Kenneth H. Leichter (not yet admitted *pro hac vice*)  
13 FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

14 901 New York Avenue, NW  
15 Washington, DC 20001-4413  
Telephone: (202) 408-4000  
16 Facsimile: (202) 408-4400

17 Attorneys for Defendant  
18 CHINA & ASIA TRAVEL SERVICE, INC.,  
D/B/A CHINA INTERNATIONAL TRAVEL SERVICE (USA)

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA  
21 SAN FRANCISCO DIVISION

22 CHINA INTL TRAVEL SERVICES (USA),  
23 INC.,

Plaintiff,

24 v.

25 CHINA & ASIA TRAVEL SERVICE, INC.,  
26 D/B/A CHINA INTERNATIONAL TRAVEL  
27 SERVICE (USA), and DOES 1-10, inclusive,

28 Defendant.

CASE NO. 08-cv-01293 JSW

**REQUEST TO ENTER DEFAULT**

1 TO: THE CLERK OF THE ABOVE-ENTITLED COURT  
2 Defendant/Counterclaim Plaintiff CHINA & ASIA TRAVEL SERVICE, INC., D/B/A  
3 CHINA INTERNATIONAL TRAVEL SERVICE (USA) hereby requests that the Clerk of the  
4 above-entitled court enter default in this matter against Plaintiff/Counterclaim Defendant CHINA  
5 INTL TRAVEL SERVICES (USA), INC. Default is appropriate because (1) CHINA INTL  
6 TRAVEL SERVICES (USA), INC. was served with Defendant/Counterclaim Plaintiff's Answer and  
7 Counterclaims on March 31, 2008 (McCauley Decl. Exh. A); (2) more than twenty days have passed  
8 since Plaintiff/Counterclaim Defendant was served with the Answer and Counterclaims, and (3)  
9 Plaintiff/Counterclaim Defendant has not answered or otherwise plead in response to the  
10 Counterclaims in any way.

11 The above stated facts are set forth in the accompanying Declaration of Robert F. McCauley,  
12 filed herewith.

13 Dated: August 22, 2008

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

14  
15  
16 By                     /s/                      
17 Robert F. McCauley  
18 Attorneys for Defendant/Counter-Plaintiff  
19 China & Asia Travel Service, Inc., d/b/a China  
20 International Travel Service  
21  
22  
23  
24  
25  
26  
27  
28